COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

- 100 to 2005

PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF COLUMBIA GAS OF	)	
KENTUCKY, INC. TO IMPLEMENT A NEW	)	
SMALL VOLUME GAS TRANSPORTATION	)	
SERVICE, A GAS PRICE HEDGING PLAN,	)	CASE NO. 2004-00462
AN OFF-SYSTEM SALES AND CAPACITY	)	
RELEASE REVENUE SHARING MECHANISM	[, )	
AND A GAS COST INCENTIVE MECHANISM	( )	

## SUPPLEMENTAL REQUEST FOR INFORMATION POSED BY THE ATTORNEY GENERAL

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Supplemental Request for Information to Columbia Gas of Kentucky, Inc. to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not

exist, but a similar document, workpaper or information does exist, provide the similar document,

workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please

identify each variable contained in the printout which would not be self evident to a person not familiar

with the printout.

(7) If the company has objections to any request on the grounds that the requested

information is proprietary in nature, or for any other reason, please notify the Office of the Attorney

General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author;

addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature

and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control

of the company, please state: the identity of the person by whom it was destroyed or transferred, and the

person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and,

the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy,

state the retention policy.

Respectfully submitted,

GREGORY D. STUMBO

ATTORNEY GENERAL

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## NOTICE OF FILING AND CERTIFICATE OF SERVICE

Notice is hereby given that the original and ten true copies of the foregoing have been filed with the Executive Director of the Kentucky Public Service Commission by hand delivery to 211 Sower Boulevard, Frankfort, Kentucky 40601, this the 18th day of January, 2005. I further certify that this same day the parties have been served by mailing a true copy, postage prepaid, to Counsel of Record as follows:

HONORABLE STEPHEN B SEIPLE COLUMBIA GAS OF KENTUCKY INC 200 CIVIC CENTER DRIVE P O BOX 117 COLUMBUS OH 43216-0117

HONORABLE RICHARD S TAYLOR CAPITAL LINK CONSULTANTS 225 CAPITAL AVENUE FRANKFORT KY 40601

Assistant Attorney General

## Supplemental Request for Information Of the Attorney General to Columbia Gas of Kentucky Inc. Case No. 2004-00462

AG 2-1. Follow up to AG 1-20: Please identify all sharing/incentive programs approved in Kentucky that use the 50% sharing approach 'when it comes to such things as off system sales margins' by case name. Include the case number and date of the Order approving that sharing. To the extent that such programs entail things other than off system sales, please indicate what activity is covered by the incentive program.